

Docket No. 100110363-1

Remarks

This communication is responsive to the Office Action of May 3, 2006. Reexamination and reconsideration of claims 1-49 is respectfully requested.

Summary of The Office Action

Claims 12-13, 15-25, 27-33, 36-39 and 41-47 were rejected under 35 U.S.C. § 102(e) as being anticipated by Hossain et al. (US Pub. 2003/0059199 A1)(Hossain). Hossain describes manually creating a digital photo album that is stored in a television based medium (e.g., VHS). The claims describe automatically reorganizing files from a camera specific organization (e.g., file system) to a different organization (e.g., file system).

Claims 14, 26 and 40 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Hossain in view of Kain, III et al. (US 6,119,118)(Kain).

Claims 34-35 and 48-49 were rejected under 35 U.S.C. 103(a) as being unpatentable over Hossain in view of Calia (US 5,450,504)(Calia).

Claims 1-2, 4-11 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Parulski et al. (US 6,567,119 B1)(Parulski) in view of Bell et al. (US 6,147,742)(Bell). Parulski describes reformatting image files from a camera format to a print format. Bell describes reformatting image files for photofinishing purposes. The claims describe reorganizing a collection of files from a camera organization (e.g., file system) to another organization (e.g., file system) while leaving the file format unchanged.

Claim 3 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Parulski in view of Bell and further in view of Kain.

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The Claims Patentably Distinguish Over the References of Record

The application concerns structures for organizing files (e.g., file systems). The references concern file formats (e.g., JPEG).

The claims describe reorganizing a set of files from one organization (e.g., file system) to another organization (e.g., file system). For example, a camera may arrange files in a file system native to the camera (e.g., Design Rule For Camera File System (CDF), JEIDA 1999.1.7) while a computer to which the files are downloaded may arrange the files in a file system native to the computer (e.g., Windows File System). The claims describe how this reorganizing can be automated. After the operation of the claims, the files may still be in the same format (e.g., JPEG) on the computer as they were on the camera. After the operation of the references, however, the files will not be in the same format, and no arrangement for a file system is performed.

The references describe reformatting files from a camera format (e.g., FlashPix) to another format (e.g., JPEG). If a set of files is downloaded from the camera, the references do not describe changing how the set is organized. That is, the references do not address the file system. Rather, the references describe changing how each individual file is formatted while leaving the overall organization alone.

File systems and their reorganization is described several places in the application. For example, [0002] reads "modern digital cameras utilize a file system that is similar to the standard Design Rule For Camera File System (DCF), JEIDA 1999.1.7". Similarly, [0010] reads "assets are made accessible by the operating system of the device in the form of a file system in which the captured assets and metadata are organized in a camera-specific collection of files and directories". Likewise, [0013] reads "the output of the asset normalization process may be ... a restructured set of files and directories." Thus, the claims clearly refer to file systems. Claim 2 has been amended to make this even more clear.

Hossain – US Patent Publication 2003/0059199

Hossain describes manually creating a digital photo album that is stored on a television based medium like a VHS tape. Creating a digital photo album includes looking through images available on a camera, converting their file format to a television visible format, and storing the reformatted image on a tape. No file system reorganization occurs in Hossain. To the extent that

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any matching or selecting is performed, it is done manually by a user dragging and dropping a picture onto a tape.

Hossain describes receiving a group of pictures from a camera, reformatting the images into a television based storage format (e.g., VHS, DVD) and including selected pictures in a playback sequence. Thus, Hossain describes creating a digital photo album for digital photos acquired on a digital camera. The digital photo album can be viewed on a television. In Hossain, to the extent that assets are re-organized, they are reorganized manually. For example, Hossain [0015] declares that the “user selects the playback sequence.” In Hossain, the internal data of files is reformatted from a first format to a second format. However, not even the format selection is automated. Indeed, Hossain [0032] recites that “a user preselects which video standard 24 he or she desires for the digital photo album”. Thus, in addition to being irrelevant because it concerns data reformatting and not file system reorganization, Hossain is further irrelevant because much of its work is performed manually by a user.

Parulski – US Patent 6,567,119

Parulski is directed to processing raw camera data into final output data in a single, integrated process to provide improved image quality when printing. (Abstract) This includes converting image data from a first format like FlashPix to a second format like JPEG (see column 3, lines 14-19). Thus, Parulski concerns changing the internal data format of an individual file and does not concern changing how a file system is organized. The present claims deal with asset organization schemes for collections of files and related metadata. The claims describe how a collection of files can be received from a digital camera and then be reorganized from the organization produced by the camera into a different organization. Note that the file organization is changed without changing the internal file format. Parulski is not directed to the same problem and thus does not disclose the features of the claimed invention.

The claims must be read in light of and consistent with the specification. The specification describes assets as “pictures, movies, audio, metadata and the like...” (specification paragraph [0002]). These assets are described as being organized, for example, into a file system. Claim 1 recites that the set of assets are processed using a selected restructuring scheme to reorganize them into a selected organization structure (e.g., second file system). One of ordinary skill in the art would understand that the claim relates to processing a set of files (e.g.,

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pictures, movies, audio) that are organized in one organization structure (e.g. file system, group of files, directories, group of directories) into a different organization structure.

Conversely, Parulski describes in col. 5, line 63 to col. 6, line 32, a file format extension step. This step includes storing 12-bit compressed CFA data in a FlashPix file along with tile image data. This is accomplished by adding an extension property set to the FlashPix file. The extension property set can store data and metadata. Thus, Parulski describes how individual FlashPix files can be modified. However, Parulski remains silent about how a set of files and associated metadata can be reorganized from a first organization to another organization.

The present claims do not concern converting image data from one format to another format. As cited by the Office Action, Parulski describes in col. 5, lines 46-62 how image data can be converted from one format to another format. Applicant previously amended the claim language to remove this type of interpretation with the claim language of "asset organization structure" and "organization scheme." This more clearly defines that it is the organization of the assets (e.g. file system) that is processed and not the data format that makes the content of an image (e.g. JPEG, bitmap, FlashPix). This distinction is made even more clear by the amendment to claim 2.

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35 U.S.C. §102

For a 35 U.S.C. §102 reference to anticipate a claim, the reference must teach every element of the claim. Section 2133 of the MPEP recites:

A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference. *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987).

Claims 12-13, 15-25, 27-33, 36-39 and 41-47 were rejected under 35 U.S.C. § 102(e) as being anticipated by Hossain.

Independent Claim 12

Hossain describes manually creating a digital photo album that is stored in a television based medium (e.g., VHS). Claim 12 describes automatically reorganizing files from a camera specific organization (e.g., file system) to a different organization (e.g., file system). Hossain does not describe an asset normalizing method, rather it describes an asset reformatting method. Hossain does not describe automatically matching an asset organization scheme, rather it describes manually selecting an asset for inclusion in a digital photo album. Hossain does not describe processing assets into a selected organization (e.g., file system), rather it describes reformatting the internal data of file from a first format (e.g., FlashPix) to a second format (e.g., JPEG). Thus, Hossain does not teach each and every element as set forth in claim 12. Therefore claim 12 is not anticipated and is in condition for allowance. Accordingly, dependent claims 13-21 are also in condition for allowance.

The Office Action asserts that the abstract, summary, and [0032]-[0033] describe the claimed automatic matching and processing. A sentence by sentence and phrase by phrase analysis of these citations provided in the table below yields no such disclosure. To advance prosecution on the merits, Applicant requests an identification by sentence and/or term the portion of these cited passages that allegedly disclose the claimed elements.

| Cited Text | Automatic Matching Disclosed? | Processing To Selected Organization Structure Disclosed/ |
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| (Abstract) The present invention provides a system and method for creating and viewing a digital photo album on a television with the use of commonly available playback devices, such as a DVD player. | No | No |
| The system and method generally comprise a user's creation of digital photographs (e.g., using a digital camera or scanning an analog photo), | No | No |
| the user transmitting (electronically or otherwise) the image files to a central computer which then processes and converts the image files into one or combination [sic] of any number of predetermined video standards (such as digital VHS standard, VHS standard, ... etc.) | No | No |
| and then writing the converted data to a transportable storage media that is in accordance with the video standard chosen (i.e., if files converted to a DVD format, then the transportable media must be a DVD). | No | No |
| (Summary) In accordance with the foregoing objects and advantages, the present invention provides a system and method for creating and viewing a digital photo album on a television with the use of commonly available playback devices, such as a DVD player. | No | No |
| The system and method generally comprise a user's creation of digital photographs (e.g., using a digital camera or scanning an analog photo), | No | No |
| the user electronically or otherwise (e.g., regular courier or mail service) transmitting the image files to a central computer | No | No |
| which then processes and converts the image files into one or combination of any number of predetermined video standards (such as ...), | No | No |

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| | | |
|---|----|----|
| and then writing the converted data to a transportable storage media that is in accordance with the video standard chosen (i.e., if files converted to a DVD format, then the transportable media must be a DVD). | No | No |
| [0032] Computer 14 includes a memory for storing digital picture files and software that includes subroutines containing various video standards 24 (e.g., VHS, ...). | No | No |
| The standards for DVD (read only disc) may be found in the following documents ... | No | No |
| A user preselects which video standard 24 he or she desires for the digital photo album. | No | No |
| With reference to FIG. 2, the software and hardware residing in computer 14 is capable of receiving digital video files from a user, | No | No |
| grouping 26 the picture files according to the user's choices, | No | No |
| processing/formatting 28 the picture files into the selected video standard 24, | No | No |
| creating a playback sequence 30 for the pictures according to the user's selections, | No | No |
| creating a menu 32 that the user may use to control the playback sequence of the photos, | No | No |
| processing/formatting 34 the picture files and menu for storage in compliance with the selected video storage standard 24, | No | No |
| and writing 36 the formatted digital files to a transportable storage media 38 that is the same as the chosen video standard 24 (e.g., if DVD standard chosen, files stored on a DVD). | No | No |
| [0033] With reference to FIG. 3, in operation, a user would save a group of picture files 40 in a digital format. | No | No |

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| | | |
|---|----|----|
| This is done either through taking the pictures with some form of digital camera, or by digitizing analog photographs with a digital scanner 42. | No | No |
| The user would then interface with the computer 14 residing at remote location 16 via the Internet, or some other form of networked connection. | No | No |
| The user would then send the picture files 40 to computer 14, and organize picture files 40 into desired groups (this is preferably done through the use of a browser program that serves as the graphical user interface and permits the user to drag and click the image files into a predefined groups and sequences within the groups). | No | No |
| Computer 14 will then create a menu file 44 which will be used for interactive playback of the images (or if the user already has a menu file, computer 14 may use this pre-existing menu file 44). | No | No |
| The software and hardware of computer 14 then completes the process of creating the digital photo album as previously described; | No | No |
| that is, processing/formatting 28 the picture files into the selected video standard 24, | No | No |
| creating the playback sequence 30 for the pictures according to the user's predesignated selections of groups and sequences, | No | No |
| creating a menu 32 that the user may use to control the playback sequence of the photos, | No | No |
| processing/formatting 34 the picture files and menu for storage in compliance with the selected video storage standard 24 | No | No |
| and writing 36 the formatted digital files to a transportable storage media 38 that is the same as the chosen video standard 24. | No | No |
| The device/driver (which may be external or internal) for | No | No |

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| writing the files is commercially available, such as from Philips Corporation. | | |
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Independent Claim 22

Claim 22 describes a digital camera system that includes a comparison component for automatically matching a camera specific file system organization to a selected normalizer of a set of normalizers. As described above, the result of normalizing is that the organization of the set of files is changed (e.g., file system). Additionally, claim 22 describes an asset-processing component that organizes the digital assets (e.g., files) into the non-camera specific file system organization.

Hossain does not describe the comparison component. In Hossain, to the extent that any normalizing occurs, it occurs according to a pre-selected method. Since the method is pre-selected, there is no need for a comparison component and thus none is described. Hossain does not describe automatically matching a normalizer. Rather it describes manually selecting an asset for inclusion in a digital photo album. Additionally, Hossain does not describe organizing assets into a selected organization (e.g., file system), rather it describes reformatting a file from a first format (e.g., FlashPix) to a second format (e.g., JPEG). Thus, Hossain does not teach each and every element as set forth in claim 22. Therefore claim 22 is not anticipated and is in condition for allowance. Accordingly, dependent claims 23-35 are also in condition for allowance.

Independent Claim 36

Claim 36 describes a computer-readable medium that stores instructions for processing digital image assets (e.g., files) from a camera specific organization (e.g., file system) to a second organization (e.g., file system). The instructions include automatically matching the asset organization scheme. Hossain does not describe this automatic matching. To the extent that Hossain describes any matching, it describes manually selecting an asset for inclusion in a digital photo album and manually preselecting the video format for the photo album. Additionally, Hossain does not describe storing instructions to implement such a method on a computer-readable medium. Thus, Hossain does not teach each and every element as set forth in claim 36.

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Therefore claim 36 is not anticipated and is in condition for allowance. Accordingly, dependent claims 37-49 are also in condition for allowance.

Claims 13, 23, and 37

These claims are dependent claims. The independent claims from which they depend have been shown to be not anticipated. Thus, these claims are also not anticipated and are in condition for allowance. Additionally, these claims recite that matching the asset organization scheme includes comparing assets and metadata with a predetermined set of characterizations of assets and metadata to determine whether a match is present.

To the extent that there is any matching done in Hossain, it is done manually, not by a computer. For example, [0032] recites that "a user preselects which video standard 24 he or she desires for the digital photo album." If the standard is preselected, there is no need to automatically match attributes in order to make a selection because the selection has already been made. Once again, performing a sentence by sentence, even clause by clause analysis of the cited passages yields no mention of the automatic matching. For this additional reason these claims are not anticipated and are in condition for allowance.

Claims 15, 27, and 41

These claims are dependent claims. The independent claims from which they depend have been shown to be not anticipated. Thus, these claims are also not anticipated and are in condition for allowance. Additionally, these claims recite that a fallback asset normalizer may be applied if no match is found during automatic matching.

As described above, to the extent that there is any matching done in Hossain, it is done manually, not by a computer. Paragraph [0032] recites that "a user preselects which video standard 24 he or she desires for the digital photo album." Since the standard is preselected there is no chance that a match will not be made and thus there is no mention of a fallback method. Performing a sentence by sentence, clause by clause analysis of the cited passages yields no mention of a fallback asset normalizer. For this additional reason these claims are not anticipated and are in condition for allowance.

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Claims 16, 28, and 42

These claims are dependent claims. The independent claims from which they depend have been shown to be not anticipated. Thus, these claims are also not anticipated and are in condition for allowance.

Claims 17, 29, and 43

These claims are dependent claims. The independent claims from which they depend have been shown to be not anticipated. Thus, these claims are also not anticipated and are in condition for allowance. Additionally, these claims have been amended to remove "where necessary converting formats of files". For this additional reason these claims are not anticipated and are in condition for allowance.

Claims 18, 30, and 44

These claims are dependent claims. The independent claims from which they depend have been shown to be not anticipated. Thus, these claims are also not anticipated and are in condition for allowance. Additionally, these claims recite that asset normalization provides a file output that contains references to files and metadata determined to be relevant to a set of inputs. The only thing Hossain produces is a digital photo album, which is an ordered collection of images stored on tape. There is no file output that includes references to both files and metadata. There is just a VHS tape or a DVD.

Sentence by sentence, clause by clause analysis of the cited passages yields no mention of a file output. For this additional reason these claims are not anticipated and are in condition for allowance.

Claims 19, 31, and 45

These claims are dependent claims. The independent claims from which they depend have been shown to be not anticipated. Thus, these claims are also not anticipated and are in condition for allowance. Additionally, these claims recite that the file output includes files discovered by interrogating a file system to discover additional relevant files. The only thing Hossain produces is a digital photo album, which is an ordered collection of images stored on tape. There is no file output. There is just a VHS tape or a DVD. The files in the digital photo

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album are selected manually. Thus, there is no interrogation of a file system to discover additional relevant files, there is just dragging and dropping.

Sentence by sentence, clause by clause analysis of the cited passages yields no mention of the interrogating. For this additional reason these claims are not anticipated and are in condition for allowance.

Claims 20, 32, and 46

These claims are dependent claims. The independent claims from which they depend have been shown to be not anticipated. Thus, these claims are also not anticipated and are in condition for allowance.

Claims 21, 33, and 47

These claims are dependent claims. The independent claims from which they depend have been shown to be not anticipated. Thus, these claims are also not anticipated and are in condition for allowance.

Claims 24 and 38

These claims are dependent claims. The independent claims from which they depend have been shown to be not anticipated. Thus, these claims are also not anticipated and are in condition for allowance. Additionally, these claims describe processing information including a directory pattern, a file name pattern, and an image metadata pattern. There is no comparing done in Hossain, there is simply manual dragging and dropping. Thus, it follows that there is no processing of a directory pattern, a file name pattern, and an image metadata pattern during the matching that is not performed. For this additional reason these claims are not anticipated and are in condition for allowance.

Claims 25 and 39

These claims are dependent claims. The independent claims from which they depend have been shown to be not anticipated. Thus, these claims are also not anticipated and are in condition for allowance. Additionally, these claims describe how a directory pattern is assembled by an ordered traversal of a directory and by concatenating directory names. Once

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again there is no automatic comparing done in Hossain, there is simply manual dragging and dropping. Thus, it follows that there is no assembly of a directory and in particular no assembly using concatenation. For this additional reason these claims are not anticipated and are in condition for allowance.

35 U.S.C. §103

To establish a prima facie case of 35 U.S.C. §103 obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. MPEP 2143.01 Second, there must be a reasonable expectation of success. MPEP 2143.02 Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. MPEP 2143.03 Additionally, the teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, not in applicant's disclosure. In re Vaeck, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991). This requirement is intended to prevent unacceptable "hindsight reconstruction" where Applicant's invention is recreated from references using the Application as a blueprint.

Here, the second and third criteria described in MPEP 2143 are not satisfied since there is no reasonable expectation of success and the combination of references does not teach or suggest all the claim limitations. None of the references, alone and/or in combination, teach reorganizing digital camera files from one file system organization to another. Thus, none of the claims are obvious for at least this reason. Furthermore, even if the references were combined as suggested, they could still not produce the result of the claimed invention.

Claims 14, 26 and 40 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Hossain in view of Kain. These claims are dependent claims. The independent claims from which they depend have been shown to be not anticipated. Thus, these claims can not be obvious and are in condition for allowance. Additionally, these claims describe indicating that no match was found during automatic matching. There is quite simply no automatic matching done in Hossain. There is simple manual dragging and dropping. Since there is no matching, it

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follows that there is no notification when a match can not be made. Kain does not remedy the defect of Hossain.

To the extent that any matching is performed, a file format to file format comparison occurs. In the claims, the comparing occurs for asset normalizers. These asset normalizers are logics that perform reorganizations by executing, for example, computer instructions. Manually comparing file formats does not teach automatically comparing normalizing logics and notifying a user when no match can be made. For this additional reason these claims are not obvious and are in condition for allowance.

Claims 34-35 and 48-49 were rejected under 35 U.S.C. 103(a) as being unpatentable over Hossain in view of Calia. These claims are dependent claims. The independent claims from which they depend have been shown to be not anticipated. Thus, these claims can not be obvious and are in condition for allowance. Additionally, these claims describe assigning a comparison score where a highest score represents an optimal match. There is no automatic matching done in either Hossain or Calia. There is simple manual dragging and dropping. Since there is no matching, it follows that there is no scoring of the quality of a match. Manually comparing file formats and not scoring the manual comparison does not teach automatically comparing normalizing logics and scoring the quality of the match. For this additional reason these claims are not obvious and are in condition for allowance.

Claims 1-2, 4-11 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Parulski in view of Bell. As described above, Parulski is a photo-finishing application. Similarly, Bell is a photo-finishing application. Both Parulski and Bell concern reformatting digital camera images to make them print better. Neither Parulski nor Bell describe manipulating the organization (e.g., file system) for a set of images.

Independent Claim 1

Claim 1 describes receiving assets (e.g., files) organized in a first organization structure (e.g., file system), automatically (not manually) identifying a restructuring scheme, and processing the assets (e.g., files) from the first structure (e.g., camera based file system) into a second structure (e.g., personal computer based file system) using the automatically selected

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scheme. As described above, neither Parulski nor Bell describe asset reorganizations like file system manipulations. Thus, claim 1 is not obvious and is in condition for allowance. Accordingly, dependent claims 2-11 are similarly not obvious and are in condition for allowance.

Claim 2

This claim is a dependent claim. The independent claim from which it depends has been shown to be not obvious. Thus, this claim can not be obvious and is in condition for allowance. Additionally, this claim describes comparing the set of assets (e.g., files) to a predetermined set of characterizations of assets (e.g., files) to see whether a match is present. Neither Parulski nor Bell perform this type of matching because they are concerned with photofinishing. To the extent that either Parulski or Bell do any matching, it is manual matching for file conversion types. File conversions do not teach file system reorganizations. For this additional reason this claim is not obvious and is in condition for allowance.

Additionally, claim 2 has been amended to make more clear that the organization structure under consideration is a file system.

Claim 3

Claim 3 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Parulski in view of Bell and further in view of Kain. This claim is a dependent claim. The independent claim from which it depends has been shown to be not obvious. Thus, this claim can not be obvious and is in condition for allowance. Additionally, this claim describes providing an indication to a user when no match is present. Neither Parulski, Bell, nor Kain perform the type of matching described in the claim. Since they perform no matching, it follows that they do not provide an indication when no match is found. For this additional reason this claim is not obvious and is in condition for allowance.

Claims 4-11

These claims are dependent claims. The independent claim from which they depend has been shown to be not anticipated. Thus, these claims can not be obvious and are in condition for allowance. Additionally, these claims describe additional features not present in the references, alone and/or in combination.

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Claim 4

Claim 4 includes applying a fallback scheme. A close inspection of both Parulski and Bell reveals no mention of a fallback scheme. That neither reference describes a fallback scheme is not surprising because a fallback scheme is only required if automated matching reveals no match. Since neither reference performs any automated matching, it follows that neither reference would have a provision for handling a “no match found” situation. For this additional reason this claim is not obvious and is in condition for allowance. Applicant invites a pinpoint citation to the sentence in either Parulski or Bell that purportedly reveal this element so that meaningful prosecution on the merits can proceed.

Claim 5

The rationale for rejecting claim 5 includes a Hossain/Parulski combination. However, the claim was rejected under §103 as being unpatentable over Parulski in view of Bell. Thus, the rationale is improper and this rejection should be removed.

Additionally, claim 5 includes applying asset normalization. None of the references describe asset normalization. The Office Action equates reformatting a file with asset normalization. This is not a “broadest reasonable interpretation” because the specification describes the inputs and outputs for asset normalization. While these limitations are not read into the claim, they provide the context for the claim and remove the “broadest reasonable interpretation” engaged in by the Office Action. By way of illustration, in one example the inputs are described as being a set of files arranged in a file system and the outputs are described as being a set of files arranged in a different file system. The references reformat image files from one format to another format. For this additional reason this claim is not obvious and is in condition for allowance.

Claim 6

Claim 6 includes limitations on asset normalization that include, for example, making explicit file identity and purpose, making explicit file relationships, extracting metadata, and so on. Neither reference describes asset normalization and thus neither reference describes these type of limitations in asset normalization. The Office Action equates reformatting a file with

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asset normalization. This is not a "broadest reasonable interpretation" because the specification describes the inputs and outputs for asset normalization. The inputs are described as being a set of files arranged, for example, in a file system. The outputs are described as being a set of files arranged, for example, in a different file system. For this additional reason this claim is not obvious and is in condition for allowance.

Claim 7

Claim 7 includes the additional limitation of producing a file output that includes references to files and metadata determined to be relevant to a set of inputs. Neither reference produces such an output. The output of the references is a reformatted printable image. The reformatted file may include image data and metadata about the image data. However, the reformatted file will not include references to other files and their metadata. For this additional reason this claim is not obvious and is in condition for allowance.

Claim 8

Claim 8 includes the additional limitation of the file output including files discovered by interrogating a file system. Neither reference describes a file system and thus it follows that neither reference describes interrogating the missing file system. For this additional reason this claim is not obvious and is in condition for allowance.

Claim 11

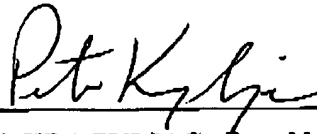
Claim 11 includes the additional limitation that automatically identifying a restructuring scheme includes using a framework that has a set of available asset normalizers. Neither reference performs automatic identification. For example, Parulski performs manual identification of files to process. Since there is no automatic identification, it follows that there is no framework of available asset normalizers that are employed in the missing automatic identification. For this additional reason this claim is not obvious and is in condition for allowance.

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Conclusion

For the reasons set forth above, **claims 1-49** patentably and unobviously distinguish over the references of record and are now in condition for allowance. An early allowance of all claims is earnestly solicited.

Respectfully submitted,



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